

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	Case No. 22-90054 (MI)
TALEN ENERGY SUPPLY, LLC, <i>et al.</i> ,	§	
	§	Chapter 11
Debtors. ¹	§	(Jointly Administered)
	§	

RULE 2019 DISCLOSURE OF MULTIPLE REPRESENTATION

Pursuant to Rule 2019(a) of the Federal Rules of Bankruptcy Procedure, Clark Hill PLC (“**Clark Hill**”), submits this Verified Rule 2019 Statement of Multiple Representation (“**Verified Statement**”) to provide the following information:

1. Clark Hill represents the following parties in interest with respect to the above captioned matter:

- a) Flowserve US, Inc.
- b) Silgan Plastics Corporation
- c) Silgan White Cap Corporation
- d) System One Holdings, LLC
- e) Waste Management National Services, Inc.
- f) Waste Management of New Jersey, Inc.
- g) ShawCor Ltd.

2. The entities listed above and on *Exhibit A* are each a creditor of the Debtors and the nature of each claim is described on *Exhibit A* attached hereto. Clark Hill represents each of these clients individually; they do not constitute a committee of any kind.

3. Each of the parties listed on *Exhibit A* has consented to multiple representation by Clark Hill in the above-captioned matter.

4. Clark Hill reserves the right to amend this Verified Statement as necessary.

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/talenenergy>. The Debtors’ primary mailing address is 1780 Hughes Landing Boulevard, Suite 800, The Woodlands, Texas 77380.

Dated: June 21, 2022

CLARK HILL PLC

/s/ Robert P. Franke

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**COUNSEL FOR FLOWSERVE US, INC.;
SILGAN PLASTICS CORPORATION;
SILGAN WHITE CAP CORPORATION;
SYSTEM ONE HOLDINGS, LLC;
WASTE MANAGEMENT NATIONAL
SERVICES, INC.; WASTE
MANAGEMENT OF NEW JERSEY,
INC.; SHAWCOR LTD.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 21, 2022, a true and correct copy of the foregoing document was served upon all parties who have consented to service via this Court's ECF System.

/s/ Robert P. Franke

Robert P. Franke

Exhibit A

Creditor Name and Address	Nature of Claim ²	Amount of Claim ³
Flowserve US, Inc.	Flowserve US Inc. holds an unsecured claim against the Debtors' estate in the approximate amount of \$500,000 relating to the supply of goods and services.	\$500,000 (approximately)
Silgan Plastics Corporation	Silgan Plastics Corporations holds an unsecured claim against the Debtors' estate in the approximate amount of \$2,400,000 relating to a manufacturing property to which the Debtors provided electricity. The electricity agreement with the Debtors was subsequently rejected.	\$2,400,000.00 (approximately)
Silgan White Cap Corporation	Silgan White Cap LLC holds an unsecured claim against the Debtors' estate in the approximate amount of \$1,500,000 relating to a manufacturing property to which the Debtors provided electricity. The electricity agreement with the Debtors was subsequently rejected.	\$1,500,000.00 (approximately)
System One Holdings, LLC	System One Holdings, LLC provided labor and staffing for the Debtors and anticipate payment in full pursuant to the Wage Order [ECF No. 117; 464].	N/A
Waste Management National Services, Inc. and Waste Management of New Jersey, Inc.	Waste Management National Services, Inc. and Waste Management of New Jersey, Inc. hold an unsecured claim against the Debtors' estate in the approximate amount of \$135,000 relating to utility services (i.e. waste removal).	\$135,000 (approximately)

² The "Nature of the Claim" description provided herein is not intended to be an exclusive list of all potential claims, and the parties listed on this Exhibit "A" specifically reserve the right to assert claims other than those which are described herein.

³ The "Amount of Claim" provided herein is not intended to be an exclusive amount of the potential claim and the parties listed on this Exhibit "A" specifically reserve the right to assert a different amount other than that which is listed.